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Attorney for Defendant  
JUAN CARLOS MARTINEZ CASTRO

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:19-cr-00233-TLN
	)	
Plaintiff,	)	UNOPPOSED REQUEST FOR
	)	MODIFICATION OF CONDITIONS OF
v.	)	PRETRIAL RELEASE
	)	
JUAN CARLOS MARTINEZ CASTRO,	)	
	)	
Defendants.	)	
	)	
	)	

Mr. Martinez Castro was ordered released onto pretrial supervision on January 23, 2020. CR 16, 18. His release contains several special conditions, including the imposition of a curfew (condition 13), enforced by the use of an ankle monitor (condition 12), and drug testing (condition 9). CR 18 (Special Conditions of Release). On February 18, 2020, the Honorable Carolyn K. Delaney, United States Magistrate Judge, granted the unopposed request to allow Mr. Martinez Castro non-case related contact with Shannon Jeffries, his wife and co-defendant. CR 21.

Mr. Martinez Castro is in compliance with all conditions of his release. He has no history of drug use and has not had a single positive drug test throughout his 13 months of pretrial release. He hereby requests that the terms of his release be modified to relieve him of the curfew ankle monitor conditions, and to eliminate drug testing.

1 Assistant United States Attorney Justin Lee has no objection to these  
2 modifications. Pretrial Services Officer Renee Basurto reports that Mr. Martinez Castro  
3 has been in full compliance of his terms of release as of the filing of this request.  
4 Proposed amended conditions are attached as Exhibit A to this filing.  
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6 For the foregoing reasons, Mr. Martinez Castro respectfully requests that this Court order  
7 the requested modification of the terms of his release.

8 Dated: March 2, 2021

Respectfully submitted,

9 HEATHER E. WILLIAMS  
Federal Public Defender

10 /s/ Hannah R. Labaree  
11 HANNAH R. LABAREE  
Assistant Federal Defender

12  
13 Attorneys for Defendant  
JUAN CARLOS MARTINEZ CASTRO

14  
15 ORDER

16 IT IS HEREBY ORDERED that the conditions of release be modified as specified above.  
17 The Amended Terms and Conditions are hereby adopted.

18 Dated: March 3, 2021

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21   
22 DEBORAH BARNES  
UNITED STATES MAGISTRATE JUDGE  
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